

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI

IN RE: )  
 )  
INTERSTATE UNDERGROUND WAREHOUSE )  
AND INDUSTRIAL PARK, INC. ) Case. No. 21-40834  
 ) Chapter 11  
Debtor. )

**OBJECTION TO CLAIM**

Comes now Movant Interstate Underground Warehouse and Industrial Park, Inc., and hereby objects to the Proof of Claim filed by creditor XPO Logistics Freight, Inc, in the amount of \$0.00, and filed on August 31, 2021. The court claim number is 12-1.

**Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.**

Pursuant to Local Rule 3007-1 (C), the Claimant shall have 30 days after service of the Objection in which to file a Response if you do not want the court to eliminate or change your claim. The Response shall be in writing and state why the claim should be allowed as filed. If a Response is filed, the Court will schedule a hearing. If no timely Response is filed, the Court will enter an Order sustaining the Objection to the Claim. Parties not represented by an attorney shall mail a Response to the Court at **U.S. Bankruptcy Court, 400 E. 9<sup>th</sup> St., Room 1510, Kansas City, MO 64106**. Debtor(s) not represented by an attorney must be served a copy of the Response by regular mail. If your Response is mailed, it must be early enough so that the court will receive it on or before 30 days after service of the Objection.

The basis for the objection is as follows: (PLEASE CHECK ONLY THE APPLICABLE BOXES)

The claim should be disallowed entirely because:

The claim would be one that would properly be asserted against the sender of the freight and not the Debtor. Further, the Proof of Claim does not reflect an amount and no documentation is attached.

Dated: 1/28/2022

KRIGEL & KRIGEL, P.C.

/s/ Erlene W. Krigel  
Erlene W. Krigel, MO #29416  
4520 Main St., Ste. 700  
Kansas City, MO 64111  
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ATTORNEYS FOR DEBTOR

### CERTIFICATE OF SERVICE

I Erlene W. Krigel hereby certify that a true and correct copy of the Objection to Claim was mailed to XPO Logistics Freight, Inc., by first class mail this 28th day of January, 2022:

XPO Logistics Freight, Inc.  
9151 Boulevard 26  
North Richland Hills, TX 76180

And to all interested parties received notice electronically via the court's Electronic System.

Dated: 1/28/2022

/s/ Erlene W. Krigel  
Erlene W. Krigel

**Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106**

**Instructions: Complete all parts of the form and serve on the affected parties**

ECF Event: Bankruptcy>Claim Actions>Objection to Claim (includes 30-day notice)